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July 30, 2004

Mr. John Muleta
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Mr. David Solomon
Chief, Enforcement Bureau
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Re: Enhanced 911 Status Report

Dear Messrs. Muleta and Solomon:

Verizon Wireless hereby submits its quarterly status report documenting the progress of its efforts to deploy Enhanced 911 ("E911") capabilities, as required by the Commission's *Order* granting Verizon Wireless a waiver from certain Phase II E911 obligations.[1] There have been no additional deployment benchmarks that Verizon Wireless was required to meet since its last quarterly report. Should you need additional information, please contact the undersigned.

Sincerely,

John T. Scott, III

John T. Scott, III

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[1] *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Request for Waiver by Verizon Wireless, CC Docket No. 94-102 (*"Order"*), 16 FCC Rcd. 18634 (2001).

E911 Status - Quarterly Report

SUMMARY

Verizon Wireless has successfully implemented extensive network components, purchased modified handsets, and completed a complex series of tasks associated with providing enhanced 911 Phase I and Phase II location services to the public. Verizon Wireless' efforts to deploy enhanced 911 location services are summarized as follows:

- Verizon Wireless can support E911 Phase II service requests in markets supported by all three of its switch vendors.
  - Verizon Wireless met its milestones for completing deployment of the network-assisted portion of AGPS/AFLT in Lucent and Nortel markets by April 1, 2002 and August 1, 2002 respectively.
  - Verizon Wireless completed deployment of the network-assisted portion of AGPS/AFLT in its Motorola markets by March 1, 2003.
  - As of July 15, 2004, and since its last report, Verizon Wireless has deployed Phase I service to another 161 PSAPs. Verizon Wireless now provides Phase I E911 service to a total of 2,738 PSAPs serving an estimated population of 177 million residents in parts or all of 44 States.
  - Verizon Wireless has also deployed Phase II service to an additional 123 PSAPs since its last report. VZW now provides Phase II E911 service to 1,285 PSAPs serving an estimated population of 112 million residents in parts or all of 33 states.
  - Verizon Wireless has also deployed an interim EFLT solution in its Lucent and Nortel-switched markets that is activated commensurate with the activation of Phase II E911 AGPS/AFLT service to individual PSAPs.
- As of July 15, 2004 all of the handset models Verizon Wireless sells are GPS-capable of transmitting location.

I. HANDSET DEPLOYMENT

The *Order* required Verizon Wireless to begin selling and activating AGPS/AFLT capable handsets no later than December 31, 2001. Verizon Wireless met that requirement and other handset benchmarks:

- The *Order* established certain handset sales and activation milestones, requiring that at least 25% of all new handsets sold and activated between July 31, 2002 and March 30, 2003 were to be AGPS/AFLT capable. Verizon Wireless met that requirement; 34% of its new handsets activated during that period were AGPS/AFLT capable.

- The *Order* required that at least 50% of all new handsets sold and activated between March 31, 2003 and December 30, 2003 were to be AGPS/AFLT capable. Verizon Wireless met the 50% deployment milestone; 78% of its new handsets activated during the period were AGPS/AFLT capable.

- The *Order* required that beginning December 31, 2003, 100% of all new handsets sold and activated were to be AGPS/AFLT capable. Starting November 2001, Verizon Wireless required the AGPS/AFLT capability in all new handset models it ordered from manufacturers. As a result, by December 31, 2003, 100% of all the new handsets Verizon Wireless offered for sale via its direct distribution channels (company-owned stores and personnel, telemarketing and web-based sales channels) were AGPS/AFLT-capable.

- Verizon Wireless also instituted multiple requirements and procedures intended to ensure that its indirect distribution channels (those authorized agents and retailers who purchase and sell their own handsets and activate service on Verizon Wireless' behalf) offered only GPS-capable handsets by December 31, 2003. For example, Verizon Wireless: periodically notified the indirect channels of the year-end deadline; ceased selling non-AGPS/AFLT equipment to this channel by October 1, 2003, pulled non-GPS equipment from warehouses and urged the channels to sell through all non-AGPS/AFLT handsets before year end; restricted indirect point-of-sale systems for non-AGPS/AFLT equipment activations; and imposed financial penalties for non-compliance. Further, a "block" will be placed on the indirect channel handset activation process that will prevent an indirect distributor from activating any new non-GPS handset on Verizon Wireless' network and billing system.

- All of Verizon Wireless' handsets are GPS-capable: Samsung models, SCH-A530, SCH-A610, SCH-A650, SCH-A790, SCH I600 and SPH-I700; Audiovox models CDM8600 and CDM8900; LG models VX3200, VX3200PPD, VX4500 VX6000, and VX7000; Motorola models C343, V60p, and T730; Kyocera models KWC 7135, SE 47, KX414 and KX 414PPD; RIM Blackberry 6750 and 7750;

Nokia model 3589i; and TREO 600. Verizon Wireless will continue to supplement its product line with additional GPS capable phones throughout 2004.

II. PHASE I & II PSAP DEPLOYMENT STATUS CHARTS

As part of this status update regarding Verizon Wireless' Phase II compliance efforts, the FCC requested information regarding all pending Phase I and Phase II requests. The FCC required carriers to utilize a uniform reporting format for listing pending and completed deployments in place of individual, carrier developed report formats. The attached charts provide the status of the progress of Phase I and Phase II requests as of July 15, 2004.

Below is a summary of Verizon Wireless's deployment activities:

- Verizon Wireless deployed Phase I service to another 161 PSAPs since its last Quarterly Report. As of July 15, 2004 Verizon Wireless provides Phase I E911 service to a total of 2,738 PSAPs serving an estimated population of 177 million residents. Verizon Wireless provides live Phase I E911 service to PSAPs in parts or all of 44 states: AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IA, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NV, NY, OH, OR, PA, RI, SC, SD, TN, TX, VA, VT, WA, WV, and WY.

- Verizon Wireless also deployed Phase II E911 service to an additional 123 PSAPs since its last report. VZW now provides Phase II E911 service to a total of 1,285 PSAPs serving an estimated population of 112 million residents. Verizon Wireless provides live Phase II E911 service to PSAPs in parts or all of 33 states: AL, CA, CO, CT, DC, FL, GA, IL, IN, KS, KY, LA, MD, MI, MN, MO, MS, NC, ND, NH, NV, NY, OH, OR, PA, RI, SC, SD, TN, TX, VA, VT and WA.

DECLARATION OF RICHARD J. LYNCH

I have read the foregoing E911 Quarterly Status Report. I declare under penalty of perjury that the foregoing is true and correct. Executed on July 27, 2004.

Richard J. Lynch
Executive Vice President and
Chief Technical Officer
Verizon Wireless

Certificate of Service

I hereby certify that on this 30th day of July 2004 copies of the foregoing E911 Quarterly Status Report in CC Docket 94-102 were sent by first-class mail to the following parties:

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